

August 21, 2005

Federal Communications Commission
On-line Comment Regarding:
Amendment of Part 97 of the Commission's Rules to Implement
WRC-03 Regulations Applicable to Requirements for Operator
Licenses in the Amateur Radio Service

Esteemed Federal Communications Commission members,

With this NPRM, the only remaining demonstrated skill required of Amateur Radio license applicants will be removed. Given that our licensing test pools and answers are published and in the public domain (they didn't used to be), nearly any citizen – through rote memorization – can soon become a ham operator with little expended effort. In effect, demonstrated skill, radio communications knowledge, and comprehension, will not be effectively measured prior to the issuance of high-frequency (HF) capable Amateur Radio license.

This NPRM, which eliminates the Morse code skill requirement, will not better fulfill the purpose of the amateur service; the requirement's elimination will leave a vacuum. If the Commission is bent on eliminating Element 1 requirement (the Morse code element), the Commission needs to replace it with more comprehensive written exams revolving around relevant electronics and radio theory, rules and regulations, as well as operating procedures. In addition, the question pools and their answers need to be removed from the public domain – for the reason mentioned in the first paragraph.

Amateur radio should not be made readily accessible to the masses by eliminating the only work that is still required for a license, which is (or was) learning Morse code. It is this long-standing operator's reasoned opinion that only those who are serious enough to put forth a modest work effort actually obtain an HF capable amateur radio license. Amateur radio's Morse code skill demonstrations required applicants to affect a unique and wonderful quality – gumption. Without it, a large quantity of *quality* operators are not guaranteed – only a large quantity of operators.

In effect, reducing or eliminating any skills, knowledge, and comprehension requirements is a disservice to the amateur radio service and our Nation. It is also a disservice to long-standing amateur operators who have historically worked hard for, and honestly developed skills and expertise because of, the service's higher class licenses. This NPRM disrespects the wishes of very large segment of our Nation's long-standing ham population.

STEVEN J. GEHRING, NL7W
10225 E. STRAND DRIVE
PALMER, AK 99645

More importantly, the NPRM's poor reasoning for such drastic testing changes will weaken the service. I continue to have valid and grave concerns about the recent, gradual, reduction or elimination of service testing standards. Any reduction or elimination of existing license testing requirements will lower the standard of operator, and thus, violate part (d) of Part 97.1. Therefore, the removal of CW as a requirement can only truly be debated within the context of a comprehensive review and rewrite of testing procedures – overall (which the NPRM said it addressed). And, since this NPRM's body of proposed changes doesn't include a *rebalanced* skills, knowledge, and comprehension requirements suite, such an "overall" review is not being proposed or entertained as part of this NPRM proposal; the rulemaking proposal should be REJECTED or MODIFIED.

Realistically speaking, the Commission should modify this NPRM and keep the Morse code requirement for the EXTRA CLASS license – a class of license that should reflect extra effort, superior knowledge, and an operationally experienced operator. Moreover, the present NPRM doesn't present a win-win situation for all interested and involved parties – especially long-standing and experienced amateur operators. At the least, this NPRM will deflate ham radio's staunchest supporters -- those who value Morse code, traditions, and values. It is my sincere hope the Commission will reconsider this ill-fated proposal, and adopt a compromise that respects and preserves the long history and traditions that surround this service, while also being responsive to progressive digital techniques and the formation of "new" traditions.

Respectfully submitted,

Steven J. Gehring

Licensee of Amateur Radio Station, NL7W

sjg